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## D. REMARKS

Status of the Claims

Claims 1-20 were pending in the Application prior to this Amendment. Claims 1-5, 7-17, and 19-20 have been amended, and claims 6 and 18 have been cancelled. Claims 1-5, 7-17, and 19-20 remain pending in the Application, and claims 1, 9, and 13 are independent claims.

Examiner Interview

It is Applicant's understanding that Examiner Courtney Fields is presently out of the Office until early March. During a telephone conversation with the Examiner's supervisor, Andrew Caldwell, on January 25, 2005, Examiner Caldwell offered to re-assign the present Application to a new Examiner so that Applicant's attorney could obtain a telephone interview regarding the Application. Alternately, Examiner Caldwell suggested that Applicant file a Response and contact Examiner Fields regarding a telephone interview when she returns to the Office. Applicant appreciates Examiner Caldwell's assistance in this matter, and will contact Examiner Fields in order to schedule an interview after she returns to the Office.

Drawings

The Office Action did not indicate whether the formal drawings filed by the Applicant are accepted by the Examiner. Applicant respectfully requests that the Examiner indicate whether the drawings filed on March 26, 2001 are accepted by the Examiner in the next communication.

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Amendment to the Specification

The specification has been amended to add the serial numbers of co-pending applications.

Claim Rejections - Alleged Anticipation Under 35 U.S.C. § 102

Claims 1-20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Sehr, U.S. Patent No. 6,609,659 (hereinafter Sehr). Applicant respectfully traverses the rejections under 35 U.S.C. § 102(e).

As noted above, claims 1-5, 7-17, and 19-20 have been amended, and claims 6 and 18 have been cancelled. The limitations previously found in dependent claims 6 and 18 have been incorporated into Applicant's independent claims, and therefore, the claim rejections under 35 U.S.C. § 102 will be discussed with reference to the amended claims.

To anticipate a claim, the reference must teach every element of the claim (Manual of Patent Examining Procedure § 2131). Sehr purports to teach a passport system, including passport service providers and portable passport devices (see Abstract). Sehr further purports to teach "a portable passenger card to store, process and communicate cardholder data, travel-related information, and electronic payment means" (col. 3, lines 6-9). However, Sehr does not teach or suggest several key elements of Applicant's amended, independent claims 1, 9, and 13. Each of Applicant's independent claims includes at least the following limitations:

- receiving an edit request from a customer, the edit request including a customer identifier and one or more updated security features, the updated security features each including a security item identifier;
- authenticating the customer;

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- locating a stored security feature corresponding to each of the security item identifiers, wherein the stored security features are stored in a data area corresponding to the customer; and
- manipulating one or more of the stored security features stored in the data area corresponding to the customer in response to the request, wherein the manipulating includes replacing the stored security features with the updated security features.

Sehr does not teach or suggest "receiving an edit request from a customer," where the edit request includes "a customer identifier" and security features to be updated, where each of the security features to be updated includes "a security item identifier" as taught and claimed by Applicant. The Examiner cites Sehr at col. 22, lines 15-51, and col. 24, lines 24-58 as teaching this aspect of Applicant's invention. Applicant respectfully disagrees. Sehr purports to teach that "[b]esides electronic tickets, a set of other rights, services or considerations can be compiled and stored in the passenger card as well" (col. 21, lines 55-57). For example, the passenger card may allow a customer to enter the premises where a carrier will pick up passengers, or may entitle the passenger to complementary meals and drinks (col. 21, line 57 through col. 22, line 14).

In the portion of Sehr cited by the Examiner, specifically at col. 22, lines 15-34, Sehr notes that validation codes are used to earmark passenger entitlements or goods and services provided (col. 15, lines 19-20). Security keys are also used to "guarantee the integrity of card data or database information" (col. 22, lines 23-24). However, Sehr does not teach or suggest

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that **each** of the **security features** includes "a security item identifier" as taught and claimed by Applicant in independent claims 1, 9, and 13. In Sehr, passenger entitlements (i.e. rights, services, or considerations) are tracked by the use of validation codes, because Sehr needs to keep track of when a customer right or entitlement has been used, e.g., when a customer has received his complementary meal. However, Sehr's passenger entitlements are not analogous to the security features taught and claimed by Applicant. Sehr does not teach or suggest using individual security item identifiers associated with security features, as taught and claimed by Applicant. Because Sehr does not teach or suggest the use of individual security item identifiers, Sehr also can not, and does not, teach or suggest "locating a stored security feature corresponding to **each of the security item identifiers**" as taught and claimed by Applicant.

The other section of Sehr cited by the Examiner, i.e. col. 24, lines 24-58, discusses the situation that occurs when the same seat has been assigned to two or more passengers. In this case, one of the passengers' tickets may be changed to reflect a new seating assignment. However, changing a seat number is hardly analogous to editing security features, as taught and claimed by Applicant.

Because Sehr does not teach every element of Applicant's independent claims, Applicant respectfully submits that independent claims 1, 9, and 13, and the claims which depend from them, are not anticipated by, and thus are patentable over, Sehr.

Notwithstanding the patentability of independent claims 1, 9, and 13, Applicant would also like to discuss dependent claims

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4, 11, and 16. Each of these dependent claims includes the following elements:

- receiving an authorization from the customer, the authorization including a first merchant identifier;
- storing the authorization;
- receiving a retrieval request from a merchant, the retrieval request including the customer identifier corresponding to the customer and a second merchant identifier corresponding to the merchant;
- validating the merchant request, the validating including:
  - retrieving the authorization; and
  - comparing the first merchant identifier to the second merchant identifier; and
- returning one or more of the stored security features corresponding to the customer in response to the first merchant identifier matching the second merchant identifier.

Dependent claims 4, 11, and 16 are directed toward allowing a customer to decide which merchants may access the customer's security information. For example, a customer who purchases an airline ticket will of course want to allow the airline and airport security personnel to access the customer's security features. The customer may also choose to allow selected merchants, such as a car rental agency, access to his or her security features. However, in case the customer loses his or her ticket, the customer would not want anyone who happens upon the ticket to be able to access the customer's security features. To accomplish this, Applicant claims "receiving an

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authorization from the customer, the authorization including a first merchant identifier." The merchant identifier is stored with the customer's security information. As taught and claimed by Applicant in dependent claims 4, 11, and 16, only a merchant whose merchant identifier matches a stored merchant identifier, i.e. a merchant identifier that has been stored at the customer's direction, can access the customer's stored security features.

The Examiner cites several sections of Sehr as teaching elements of dependent claims 4, 11, and 16. In particular, the Examiner cites col. 24, lines 65-67; col. 25, lines 1-16; col. 26, lines 10-67; and col. 27, lines 1-14. Although the cited sections of Sehr indicate that a passenger card may contain "a permit or license for admission of security/maintenance personnel or merchants" (col. 25, lines 5-7), there is no indication that such permits or licenses are designated by the customer, as taught and claimed by Applicant. Applicant specifically claims that the customer authorizes merchants to access security features. In Sehr, it is most likely that the card issuer, and not the customer, determines which security/maintenance personnel will be able to access the passenger card.

**Conclusion**

As a result of the foregoing, it is asserted by Applicant that the remaining claims in the Application are in condition for allowance, and Applicant respectfully requests an early allowance of such claims.

Applicant respectfully request that the Examiner contact the Applicant's attorney listed below if the Examiner believes

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that such a discussion would be helpful in resolving any remaining questions or issues related to this Application.

Respectfully submitted,

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